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February 18, 2015

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VIA CERTIFIED MAIL AND EMAIL

Kathleen H. Johnson  
Director, Enforcement Division  
U.S. Environmental Protection Agency  
75 Hawthorne Street  
San Francisco, CA 94105

Re: Response of Halliburton Energy Services Inc. to the January 27, 2015 Request for Information Pursuant to Section 114 of the Clean Air Act Regarding Compliance with California Air Resource Board's Truck and Bus Regulation

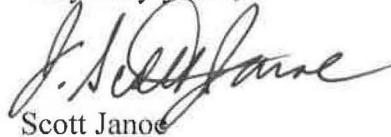
Dear Ms. Johnson:

Attached to this letter is the initial response of Halliburton Energy Services Inc. ("Halliburton") to the above-referenced request ("Request").

As agreed in correspondence on February 13, 2015, this initial response includes responses to Questions 1-6. The response to Question 7, regarding Halliburton's compliance with the Truck and Bus Regulation phase-in schedule, will be provided on February 27, 2015. Finally, we expect to provide information regarding trucks hired or dispatched by March 6, 2015.

Halliburton is continuing to search its files for responsive information and anticipates providing additional responses according to the schedule described above. If you have any questions about this cover letter or the enclosed attachments, please contact me at scott.janoe@bakerbotts.com or 713.229.1553.

Very truly yours,



Scott Janoe

cc: Janice Chan, ENF-2-1, U.S. EPA Region 9

# **FIRST RESPONSE OF HALLIBURTON ENERGY SERVICES INC. TO JANUARY 27, 2015 REQUEST**

1. Please review the list of vehicles in Table 1.1 to check if these vehicles should have been reported to EPA in the Response Letter. Provide the following information for each vehicle in Table 1.1:
- State whether Halliburton owns/owned the vehicle anytime between January 1, 2012 and the date of this letter (yes or no);
  - State whether Halliburton operates/operated the vehicle anytime between January 1, 2012 and the date of this letter (yes or no); and
  - If the response to request 1.a or 1.b is "yes," explain why the vehicle was not included in the Response Letter.:

**Table 1.1 List of vehicles**

VIN	License No.	License State	Response to a)	Response to b)	Response to c)
1NPALR9X81D564580	2NF204	OK	Yes	N/A	No records of CA operation identified.
1M9WD37261G560019	5639EA	OK	Yes	N/A	Trailer
1B9FP30257B632250	4LW1093	CA	Yes	N/A	Trailer
1FDXW47P94ED94867	7P72830	CA	Yes	Yes	Light duty vehicle
1W9AB39297M257376	3I78FV	OK	Yes	N/A	Trailer
1W9TS3926TL216003	5011CM	OK	Yes	N/A	Trailer
1W9AB37106M257291	8817FR	OK	Yes	N/A	Trailer
1NKDLTOXOYR867265	1V1053	OK	Yes	Yes	Included in Nov. 7, 2014 response as Vehicle #35
1W9AB49251M257050	6453DW	OK	Yes	N/A	Trailer
1M91H33281A211418	1869GN	OK	Yes	N/A	Trailer
1H91H33235A211865	4459EW	OK	Yes	N/A	Trailer
1M91H3327YA211341	7681DT	OK	Yes	N/A	Trailer
1M91H42251A211545	7069EG	OK	Yes	N/A	Trailer

**Response:** Answers to the Question are provided in the last three columns of the table above. Halliburton objects to Question 1b, as it is overly broad and does not relate to the requirements of Section 2025, which only applies to vehicles operated in California. Halliburton has thus interpreted this Question to ask "whether Halliburton operates/operated the vehicle in California anytime between January 1, 2012 and the date of this letter."

- Of the vehicles listed, nine are trailers that are not on-road, self-propelled vehicles and are not subject to the requirements of Section 2025. They are indicated in the last column as "trailer" and the response to Question 1b is indicated as "N/A."

- Halliburton could not find any documentation indicating that Vehicle 1NPALR9X81D564580 was operated in California anytime between January 1, 2012 and January 27, 2015. Halliburton continues to search its records and will supplement this response as appropriate.
  - Vehicle 1FDXW47P94ED94867 is a light duty vehicle with a GVWR of 26,000 pounds or less.
  - Vehicle 1NKDLTOXOYR867265 was listed as Vehicle Number 35 in Halliburton's third response, dated November 7, 2014. The license number for this vehicle is 2SJ663.
2. *Are there any other vehicles apart from those listed in Table 1.1 that Halliburton has not provided as of the date of this information request?*
- a) *If "yes," then include such vehicles in Request 4 below.*

**Response:** Halliburton has not identified any other vehicles that would be the subject of either this information request or the June 16, 2014 information request.

3. *With regard to the chart in the Response Letter that identifies the Halliburton unit number to the corresponding identifying "Vehicle Information" in the "Older Fleet" tab of Halliburton\_Third\_Response\_11072014.xlsx:*
- a) *Vehicles Number 6 (Halliburton Unit # 1054599) and 7 (Halliburton Unit # 1054599) are identical vehicles listed twice. Are these vehicles different (yes or no)?*
- b) *If "yes," then provide the information as requested in Request 4 below.*

**Response:** Vehicles Number 6 and 7 are the same vehicle, Halliburton Unit #1054599. Unit #1054599 was first equipped with a ThermaCat-e DPF with serial number 6944 on July 9, 2014. Due to a malfunction of the DPF, Unit #1054599 was removed from service to replace the first DPF with a HUG R-40 DPF with serial number B.0031215 on October 29, 2014. Unit #1054599 was taken out of operation upon discovery of the DPF malfunction and was not operated without a DPF.

4. *For each vehicle that should have been included in the Response Letter (per response to Requests 1.c, 2, and 3 above), provide the following information:*
- a) *VIN;*
  - b) *state of vehicle registration;*
  - c) *license plate number;*
  - d) *engine, model year;*
  - e) *engine family;*
  - f) *assigned vehicle terminal;*
  - g) *if the vehicle has a diesel particulate filter (yes or no);*
  - h) *date vehicle added to fleet;*

- i) *date vehicle no longer Operated in California; and*
- j) *total miles operated in California during:*
  - i) *calendar year ("CY") 2012;*
  - ii) *CY 2013;*
  - iii) *CY 2014; and*
  - iv) *CY 2015 to the date of this information request.*

**Response:** Halliburton has not identified any other vehicles that would be the subject of either this information request or the information request dated June 16, 2014.

5. *For each vehicle identified in response to Request 4 above, produce supporting documentation that verifies the miles operated. Such documentation may include, but is not limited to, vehicle electronic tracking reports, records generated for the International Registration Plan, fuel tax records, or other supporting records.*

**Response:** Not applicable.

6. *Does Halliburton have any engine model year 1993 or older vehicles with a Gross Vehicle Weight Rating ("GVWR") greater than 26,000 pounds in its fleet driven in California at any time from January 1, 2015 to the date of this letter? If "yes," provide the following:*

- a) *VIN;*
- b) *State of vehicle registration;*
- c) *License plate number;*
- d) *Engine model year;*
- e) *Engine family;*
- f) *Assigned vehicle terminal; and*
- g) *State whether the vehicle has a 2010 model year emissions equivalent engine (yes or no).*

**Response:** Halliburton has not identified any engine model year 1993 or older vehicles with a GVWR greater than 26,000 pounds that drove as part of its California fleet from January 1, 2015 through January 27, 2015.